CROWELL & MORING LLP
1001 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004-2595
(202) 624-2500
FACSIMILE (202) 628-5116

SUITE 1200
2010 MAIN STREET
IRVINE, CALIFORNIA 92614-7217
(949) 263-8400
FACSIMILE (949) 263-8414

180 FLEET STREET
LONDON EC4A 2HD
44-171-413-0011
FACSIMILE 44-171-413-0333

WILLIAM D. WALLACE
(202) 624-2807
wwallace@cromor.com

August 23, 2000

BY HAND DELIVERY

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: WT Docket No. 00-48

Dear Ms. Salas:

Enclosed for filing in the above-referenced docket are an original and six copies of the Comments of Globalstar, L.P. A copy of the pleading on diskette has been submitted to Keith Fickner of the Wireless Telecommunications Bureau.

If you have any questions, please contact the undersigned.

Sincerely,

William D. Wallace

Enclosures

cc: Keith Fickner (with diskette)

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:	)	
	)	
Amendment of Parts 13 and 80 of the	)	WT Docket No. 00-48
Commission's Rules Concerning	)	
Maritime Communications	)	
	)	
Maritime Communications	)	RM-9499
Petition For Rulemaking Filed by	)	
Globe Wireless, Inc.	)	

COMMENTS OF GLOBALSTAR, L.P.

Pursuant to Section 415 of the Commission's Rules (47 C.F.R. § 1.415), Globalstar, L.P., submits the following comments in this docket to bring to the attention of the Commission and the maritime radio community the benefits and possibilities offered by commercial satellite telecommunications systems such as the Globalstar™ system.

In this docket, the Commission is proposing rules (i) to implement changes to regulations and standards promulgated by the International Maritime Organization and the International Telecommunication Union, (ii) to modify rules affected by the recent full implementation of the Global Maritime Distress and Safety System ("GMDSS") and (iii) to remove unnecessary or duplicative radio-related requirements for vessels.[1] The Commission has also sought comment on related

[1] Notice of Proposed Rulemaking and Memorandum Opinion and Order, 15 FCC Rcd 5942 (2000) ("NPRM").

issues that would improve maritime communications. NPRM, ¶ 2. One such development is the recent availability of state-of-the-art mobile satellite telecommunications systems ("MSS"), particularly the Globalstar System.

A. MSS Systems Complement Maritime Communications.

The Commission's rules and policies on maritime communications are designed to ensure access to ship-to-shore and ship-to-ship channels of communications for distress and safety signals and also to provide adequate means for other communications purposes, such as passenger correspondence. Maritime safety-related communications require priority and must meet certain domestic and international standards.[2]

Nevertheless, commercial MSS systems offer new methods to extend and complement maritime radio communications, and their capabilities should be taken into account in assessing the evolution of maritime systems. The rules and policies for maritime communications developed in an environment where there were no communications systems even remotely equivalent to terrestrial systems. Wireline and wireless services simply do not reach vessels at sea, and it is impractical to attempt to provide service to sea-faring vessels through a patchwork of different mobile telephone standards and technologies as have developed for cellular and PCS. The advent of MSS will ultimately change maritime communications dramatically and for the better.

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[2] Globalstar is not suggesting here changes to the Commission's rules related to implementation of GMDSS or other maritime safety standards.

B. Globalstar Offers Maritime MSS.

The Globalstar system provides global Mobile-Satellite Services ("MSS") in the 1.6/2.4 GHz bands.[3] Globalstar offers high-quality satellite telecommunications to a broad range of users, including:

- Terrestrial wireless users who roam outside cellular/PCS coverage areas;
- People who live or work in remote areas that are underserved or unserved by terrestrial wireline or wireless systems;
- International travelers who need constant, reliable communications.

These categories cover both passengers and crew on boats.

Globalstar has designed its system to maintain constant, full service quality to 200 miles from the coastline of the U.S. and every other country where Globalstar service is authorized. Thus, any vessel within at least 200 miles of shore can now be connected with the Public Telephone Switched Network ("PSTN") through the Globalstar System.[4] By September—next month—a vessel travelling from Alaska down the West Coast to the tip of South America and back up the East Coast to Canada will have continuous Globalstar service.

The Globalstar system offers several complements to maritime-specific communications systems. Each vessel can have one or more unique telephone numbers at which it can be contacted by persons on land and persons on other

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[3] See Loral/Qualcomm Partnership, L.P., 10 FCC Rcd 2333 (Int'l Bur. 1995).

[4] Additional information on Globalstar services is available at the Globalstar website, www.globalstar.com.

ships. The same number can be used to reach the vessel whether it is in the North Atlantic, the Gulf of Mexico or the Mediterranean Sea.

In an emergency, calls can be made from the vessel directly to the nearest distress and rescue agency. Moreover, a Globalstar telephone can be used for passenger correspondence, leaving open radios and frequencies dedicated to safety services. For non-emergency calls, the Globalstar system offers privacy that cannot be achieved on ship-to-shore communications systems. And, the cost per minute of Globalstar service is comparable to or less than Inmarsat maritime services.

For maritime communications, Globalstar offers two different user terminals.[5] The Fixed Satellite Maritime phone connects a ship's fixed phone PBX/key system to the Globalstar satellite system. The Globalstar antenna is affixed to the boat's mast, rail or other exterior mounting to provide unblocked access to the Globalstar satellite constellation. The antenna can be powered with a solar collector, an AC/DC converter, battery or other power source. It requires 12VDC to operate, which is available on most boats.

This fixed maritime product has been weather-proofed for use in the maritime environment, and, therefore, is ideally suited for use where corrosion, salt spray, splashing and high-pressure water are common. Any standard telephone can

[5] Additional information is available at the Qualcomm Incorporated website, www.qualcomm.com. The cost of Globalstar subscriber equipment is typically far smaller and less expensive than the equipment used with any existing geostationary system.

be used with this fixed telephone installation. Separate data port and payphone options will also be available.

Second, a Globalstar Portable Tri-mode Satellite phone, with its omnidirectional antenna, can be used for boat operations with the convenience of complete portability. Although it is designed to be operated on deck with full-sky view, this terminal requires no installation, and can be carried ashore or to other boats. A portable maritime kit is available which allows the phone to be installed on an interior bulkhead or panel, connected to an exterior antenna.

In addition to voice service, these Globalstar phones can be configured for Internet access, and, when connected to a computer, can receive e-mail. Also available are position location services, short messaging, and digital facsimile. Data transmission over the air is up to 9600 bps with no additional modem or dedicated telephone required. In short, all telecommunications services (exclusive of high-speed data) available on land can be made available at sea through Globalstar.

C. Conclusion

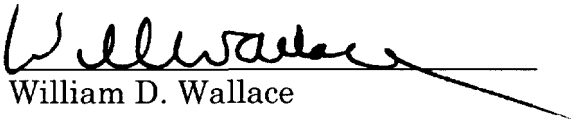
The standards and requirements in Part 87 have served the maritime community well for years. However, just as mobile telephone services have supplanted CB radios as the wireless phone of choice on land, so can MSS systems eventually replace maritime radios as the most effective means to communicate when travelling at sea.

While commercial MSS systems are not designed specifically to replace GMDSS at this time, they can offer vessels the same level of reliable

telecommunications services available to land-based users of the PSTN. Once the availability of MSS and the accessibility of terrestrial-quality phone service at sea is recognized, users will want to carry these phones as either a substitute or a back-up for traditional maritime communications. Policymakers should recognize this coming evolution in maritime communications, and start now to incorporate MSS into the maritime radio services.

Respectfully submitted,

GLOBALSTAR, L.P.



William D. Wallace

CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington D.C. 20004
(202) 624-2500

Its Attorneys

Of Counsel:

William F. Adler
Vice President, Legal and
Regulatory Affairs
Globalstar, L.P.
3200 Zanker Road
San Jose, CA 95134
(408) 933-4401

Date: August 23, 2000